

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**v.**

**CASE NUMBER: 2:06 CR 63**

**VIKRAM S. BUDDHI**

**Defendant.**

**MOTION TO EXTEND THE DEADLINE  
FOR PRE-TRIAL MOTIONS UNDER FEDERAL RULE OF  
CRIMINAL PROCEDURE 12(b)**

Comes now the defendant, by counsel, and moves the court to extend the deadline imposed at the arraignment for pre-trial motions pursuant to Federal Rule of Criminal Procedure 12(b). In support of this motion, the defendant would show the following:

1. That the defendant was arraigned on April 26, 2006 before Magistrate Rodovich. At the arraignment, Magistrate Rodovich ordered that pre-trial motions pursuant to Federal Rule of Criminal Procedure 12(b) must be filed within thirty (30) days after the arraignment.
2. The defendant has sought and been granted an extension of time through June 28, 2006 in which to file pretrial motions.
3. At the time of this filing, the government has provided limited discovery. On June 26, 2006, undersigned counsel received through e-mail a digital evidence examination report which is a summary of findings of a forensic computer examination. However, counsel believes that numerous items designated as attachments were not

forwarded. Counsel has contacted the United States Attorney working on the case and believes this issue will be resolved within the next week.

4. The government has sought and been granted a continuance of the trial until August 14, 2006. The defense has not sought nor been granted any continuance of the trial.

5. Counsel needs additional time to file pretrial motions including, but not limited to, motions concerning the aforementioned forensic computer examination.

**WHEREFORE**, the defendant requests that the court grant an extension of twenty-one (21) days for which the defendant to file pre-trial motions pursuant to Federal Rule of Criminal Procedure 12(b), and for all other just and proper relief.

DATED this 28<sup>th</sup> day of June, 2006.

Respectfully submitted,

Northern District of Indiana  
Federal Community Defenders, Inc.

By: s/John E. Martin  
John E. Martin  
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### **CERTIFICATE OF SERVICE**

I hereby certify that, on June 28, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/CM/ECF system which sent notification of such filing to the following:

**Philip Craig Benson**  
philip.benson@usdoj.gov

and I hereby certify that I have mailed the document by U.S. Postal Service to the following non CM/CM/ECF participants:

s/ John E. Martin